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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
MAY 26 2021
SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

10 UNITED STATES DISTRICT COURT
11 FOR THE EASTERN DISTRICT OF WASHINGTON

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 CARLOS REYES-SANTANA,
16 EDUARDO REYES-SANTANA,
17 ROSA MARTINEZ-RODRIGUEZ, and
18 MOLLY MARGRET BROWN,

19 Defendants.

4:21-CR-6022-RMP

INDICTMENT

Vio: 21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(viii), 846
Conspiracy to Distribute 500
Grams or More of a Mixture or
Substance Containing a
Detectable Amount of
Methamphetamine

21 U.S.C. § 853
Forfeiture Allegation

22 The Grand Jury charges:

23 On a date unknown, but by on or about September 2020, and continuing to
24 on or about May 19, 2021, in the Eastern District of Washington and elsewhere,
25 the Defendants, CARLOS REYES-SANTANA, EDUARDO REYES-SANTANA,
26 ROSA MARTINEZ-RODRIGUEZ, and MOLLY MARGRET BROWN, and other
27 individuals, both known and unknown to the Grand Jury, did knowingly and
28

1 intentionally combine, conspire, confederate and agree together with each other to
2 commit the following offense: distribution of 500 grams or more of
3 methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§
4 841(a)(1), (b)(1)(A)(viii), 846.
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6 NOTICE OF CRIMINAL FORFEITURE 7

8 The allegations contained in this Indictment are hereby re-alleged and
9 incorporated by reference for the purpose of alleging forfeitures.
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11 Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of
12 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii), 846, as set forth in this Indictment, the
13 Defendants, CARLOS REYES-SANTANA, EDUARDO REYES-SANTANA, ROSA
14 MARTINEZ-RODRIGUEZ, and MOLLY MARGRET BROWN, shall forfeit to the
15 United States of America, any property constituting, or derived from, any proceeds
16 obtained, directly or indirectly, as the result of such offense and any property used or
17 intended to be used, in any manner or part, to commit or to facilitate the commission of
18 the offense.
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22 If any forfeitable property, as a result of any act or omission of the Defendants:

- 23 a. cannot be located upon the exercise of due diligence;
- 24 b. has been transferred or sold to, or deposited with, a third party;
- 25 c. has been placed beyond the jurisdiction of the court;
- 26 d. has been substantially diminished in value; or
- 27 e. has been commingled with other property which cannot be divided
28 without difficulty,

1 the United States of America shall be entitled to forfeiture of substitute property
2 pursuant to 21 U.S.C. § 853(p).
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4 DATED this 20th day of May, 2021.
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11 Joseph H. Harrington
12 Acting United States Attorney

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14 Caitlin Baunsgard
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